

Michelle Simpson Tuegel  
(Texas Bar No.24075187)  
Email: michelle@stfirm.com  
**The Simpson Tuegel Law Firm**  
3611 Swiss Avenue, Suite 200  
Dallas, TX 75204  
Tel.: (214) 774-9121  
Fax: (817) 977-9022  
*Attorney(s) for the Plaintiffs*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS**

“APRIL,” “JENNY,” “PIA,” “VIOLET,” a  
minor, “LILY,” and “SLOANE,”

Plaintiffs,

v.

PETER ALEXANDER GROSS,

Defendant.

Case No: \_\_\_\_\_

DECLARATION OF CAROL L. HEPBURN  
IN SUPPORT OF MOTION TO PROCEED  
WITH PSEUDONYMS

**DECLARATION OF CAROL L. HEPBURN IN SUPPORT OF MOTION TO PROCEED  
WITH PSEUDONYMS**

CAROL L. HEPBURN hereby declares the following to be true and correct under penalty of perjury of the laws of the State of Washington and under 28 USC § 1746.

1. I make this declaration in support of Plaintiffs’ motion to proceed in this matter using pseudonyms.

2. Though not of record in this case, I represent the Plaintiffs “Lily” of the Vicky series, “Violet” of the At School series, and “Sloane” of the Tara series of child pornography images in matters related to their status as victims of child pornography crimes. Each of these plaintiffs were sexually exploited when they were minor children. Images of Plaintiffs’ sexual

abuse are circulated and traded on the internet by pedophiles, such as the defendant, who was convicted of child pornography crimes, and who, possessed images of Lily, Violet, and Sloane. Lily, Violet, and Sloane are each victims of multiple child pornography offenses committed in multiple states around the country.

3. Each Lily, Violet, and Sloane are real individuals whom I have personally met. Each has significant psychological injuries resulting from the child pornography related crimes of which they are victims.

4. I have represented Lily since 2008. Initially, she used the pseudonym “Vicky” but has since wanted to remove herself further from the child pornography series of that name and so has adopted the pseudonym “Lily”. Over time, I have submitted on her behalf requests for restitution in federal criminal courts in many jurisdictions. In each of these requests, a pseudonym has been used in order to protect her anonymity. No court has yet ordered that Lily use her legal name in any court proceeding. Lily previously used the pseudonym “Vicky” as this was the name of the series depicting her. She has since elected to use a different pseudonym to further distance herself from the online child sex abuse material.

5. Lily’s experiences are representative of those of the other plaintiffs. In multiple communications with Lily, with law enforcement involved with her original case, and from my review of many court files of prosecutions involving her images as well as the unredacted images which form the bases of prosecutions, I have learned that when she was ten and eleven years old, Lily was raped, sodomized, and forced to commit a myriad of sexual acts by her original abuser. He took video of his sexual abuse of her and traded the videos on the internet with other pedophiles. He even scripted some of his abuse of Lily to conform to “orders” placed by other pedophiles. Since this time, these videos have come to be known as the “Vicky” series of child

sex abuse materials. I am advised by law enforcement that her images are still among the most widely traded child sex abuse materials on the internet.

6. Attached hereto as Exhibit 1 is a true and correct copy of the Judgment entered in *United States v. Gregory Hoffman*, USDC Nev. No. 08-CR-00027. Lily was a named victim in this case; the defendant pleaded guilty to stalking her and transporting the images of her sexual abuse as a child. Among the evidence in the case were emails in which the Defendant Hoffman propositioned her and made lewd inquiries of her. Lily has shown me as well emails that she has received from several other individuals (some with email “names” suggestive of pedophilia) making inquiry about her abuse as a child.

7. I have searched the internet using Lily’s legal name and found blogs in which child pornography enthusiasts debate various issues related to her sexual abuse and performance in the videos depicting her abuse. The postings are crass and disgusting and include speculation as to whether or not, as a ten-year-old child, she enjoyed having forced sex with an adult male. While we might attach copies of the postings to this declaration, we are concerned that even redacted images of the postings could allow interested child sex abuse material (CSAM) consumers to find Lily’s legal name.

8. I have represented Violet since 2015. In requests submitted for restitution in state and federal criminal courts in many jurisdictions for Violet, a pseudonym has been used in order to protect her anonymity. No court has yet ordered that Violet use her legal name in any court proceeding.

9. I have represented Sloane since 2023. In requests submitted for restitution in state and federal criminal courts in many jurisdictions for Sloane, a pseudonym has been used in order

to protect her anonymity. No court has yet ordered that Sloane use her legal name in any court proceeding. I daily receive multiple notices of federal prosecutions including her images and videos. In my work with the Canadian Centre for Child Protection (C3P) I have been advised of current and continuous chatter on the internet concerning Sloane and her images. The communications concern her current whereabouts and activities and express ill intentions toward her. C3P is a victim advocacy agency which monitors activity on the internet related to child sex abuse material (CSAM) and has the permission of the Canadian government to view CSAM and to issue take down notices

10. I also represent multiple other victims of child pornography, for whom I regularly submit restitution requests to courts throughout the United States. No court, including the U.S. Supreme Court, has yet ordered that any of these victims use his or her legal name in any court proceeding.

11. Plaintiffs Lily, Violet, and Sloane each have significant psychological injuries resulting from the CSAM related crimes of which she is a victim. Like other victims of these crimes, these young women fear being sought out by CSAM enthusiasts attempting to initiate contact with them or sexually assault them. Each of these victims of image exploitation crimes lives in fear of unwanted contact from someone who has seen their images. Each believes that exposing their legal names to the public record puts them in physical danger and would compound the emotional harms that they suffer.

12. Lily, Violet, and Sloane have been in counseling to try to recover from the emotional problems they have because of the image exploitation crimes against them. It is taking each of them many years of counseling to cope with the harms that each has suffered, and which each continues to suffer as a result of the ongoing circulation of the images of their abuse.

13. Lily, Violet, and Sloane are very afraid to have their legal names linked with the fact they are CSAM victims or to allow any information about their identities to be publicly revealed.

14. As a part of my representation of these clients, I engage in a number of advocacy activities apart from litigation. I also work to keep abreast of the emerging information developed by law enforcement and victim advocacy organizations relative to the spread and detection of child sex abuse material.

15. One such victim advocacy organization I have met with a number of times over a number of years is the Canadian Centre for Child Protection Inc. based in Winnipeg, Manitoba, Canada (C3P). C3P is a non-governmental agency, registered as a charity in Canada, which focuses on child safety issues, particularly online child exploitation issues. I have attended conferences at C3P in Winnipeg and communicated with the agency on various matters related to the safety of children online for a number of years.

16. Among the many efforts which C3P has engaged in related to online child safety is Project Arachnid. Using an online, victim centered tool which crawls in both the clear and dark web, Project Arachnid uses hash matching technology to search out known images of child sex abuse material (CSAM). When such known CSAM is detected a removal request is sent to the online provider believed to have the ability to remove the content or media from public view. In the course of performing this work over the last several years, Project Arachnid has also been able to detect online publicly available (typically anonymous) communications between CSAM consumers.

17. In 2022, I attended a small, invitation only, conference at C3P headquarters which was organized to show professionals involved in online child safety efforts what the first five

years of Project Arachnid had revealed. In June 2023, I was part of an expert group meeting convened by the United Nations Office on Drugs and Crimes. C3P also presented at this meeting. Among the information presented on both occasions were findings indicating CSAM consumer particular “interest” in three of the Plaintiffs herein. The presentations I personally viewed included excerpts of online communications concerning all of these three Plaintiffs.

18. Among the findings from the five years of Project Arachnid data was the confirmation that trading of the images and videos of these Plaintiffs is still very active. Online publicly available discussions among anonymous CSAM consumers showed a current interest in them. Communications about them may include speculations on and the possibility of finding out their current whereabouts, appearance, vocations, college, and university attended, and other aspects of daily life. I have also been advised by employees of the Canadian Centre who work within the Cybertip.ca program that they have personally seen online posts where one or more individuals comment on a CSAM victim’s current whereabouts or post other identifying information of a victim such as, the school or university a victim attends, the name of a sports team to which a victim belongs, a victim’s community involvement, or images involving a victim’s friends or acquaintances. I have also been advised by these same employees that online postings of this nature tend to be found in dark web forums or within forums, chatrooms or platforms that permit users to remain anonymous.

19. In 2023 it became evident to me through the professionals in victim advocacy and law enforcement with whom I regularly communicate that a CSAM consumer on the internet had posted a photo of Lily’s current residence. I personally viewed this posting and the many comments by others which ensued indicating interest in this information. In 2024, I was also informed by my professional contacts of continuing verbal communications discussing the content of images

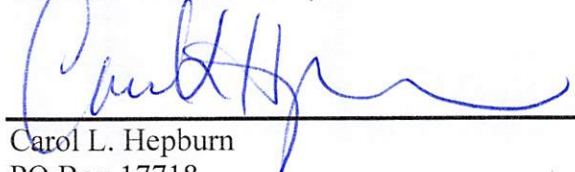
of Sloane's sexual abuse as well as her present location. In my investigation of her production case and following experiences related to the CSAM consumer community I have learned that she has received unwanted and offensive contact from these consumers on multiple occasions.

20. Lily, Violet, and Sloane have had severe psychological injuries resulting from the child sex abuse related crimes of which they are victims. They each have at different times suffer from hyper-vigilance, disassociation, and a rational paranoia relative to the prospect of the consumers of the images of their sexual abuse seeking them out and attempting to sexually assault them. They live in fear of this daily and believe that exposing their legal names to the public record puts them in physical danger.

21. Plaintiffs request permission to use pseudonyms herein in order to protect themselves from harassment, injury, ridicule, and personal embarrassment.

DATED this 24th day of February, 2025, at Seattle, Washington.

CAROL L. HEPBURN, P.S.



Carol L. Hepburn

PO Box 17718

Seattle, WA. 98127

*Attorney for Plaintiffs, Lily, Violet, and  
Sloane*